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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 RACHELLE COLVIN, individually and as
14 next friend of minor Plaintiff, G.D., and
15 DANIELLE SASS, individually and as next
16 friend of minor plaintiff, L.C., and on behalf
17 of all others similarly situated,

18 | Plaintiffs,

19 v.

20 ROBLOX CORPORATION, SATOZUKI
21 LIMITED B.V., STUDS
22 ENTERTAINMENT LTD., and RBLXWILD
23 ENTERTAINMENT LLC,

24 Defendants.

25 | **Civil Action No.: 3:23-cv-04146-VC**

26 | **REQUEST TO ENTER DEFAULT**

27 TO: THE CLERK OF THE ABOVE-ENTITLED COURT

28 In accordance with Federal Rule of Civil Procedure 55(a), Plaintiffs Rachelle Colvin,
individually and as next friend of minor Plaintiff, G.D., and Danielle Sass, individually and as next
friend of minor plaintiff, L.C., hereby request that the Clerk of this Court enter a default in this
matter against Defendant Studs Entertainment LTD (“Studs”) on the ground that said Defendant has
failed to appear or otherwise respond to the complaint within the time prescribed by the Federal
Rules of Civil Procedure.

Pursuant to Federal Rule of Civil Procedure 12(a)(1), the deadline for Defendant Studs to
respond passed over twenty-three days ago. See Declaration of Aaron Freedman in Support of
Request to Enter Default (“Freedman Decl.”) ¶ 6, filed herewith. Plaintiffs effectuated service of
the summons and complaint on Defendant Studs on January 26, 2024, as evidenced by the Proof of

1 Service on file with the Court. *See* ECF No. 62; *see also* Freedman Decl. ¶ 4. As a result, Defendant
2 Studs' responsive pleading was due on or before February 16, 2024. Freedman Decl. ¶ 6. Defendant
3 Studs, however, has failed to file or serve an answer or other responsive pleading and has not
4 otherwise appeared to contest this action. *Id.* ¶ 7.

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6 Dated: March 11, 2024

Respectfully submitted,

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/s/ Aaron Freedman

Aaron Freedman (admitted *pro hac vice*)
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Counsel for Plaintiff and the Proposed Class

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 11, 2024, the foregoing document(s) was filed through the
3 ECF system, which sent electronic notice of the filing to all counsel of record.

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5 /s/ Aaron Freedman

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